

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF IOWA

IN THE MATTER OF THE STATEMENT OF CHARGES AGAINST

ROBERT SHULTICE, M.D., RESPONDENT

No. 02-98-316

STATEMENT OF CHARGES,

**SETTLEMENT AGREEMENT and FINAL ORDER
(combined)**

COMES NOW the Iowa Board of Medical Examiners (the Board), and Robert Shultice, M.D., (the Respondent), on December 17, 1998, and pursuant to Iowa Code sections 17A.10(2) and 272C.3(4), file this combined Statement of Charges, Settlement Agreement and Final Order.

STATEMENT OF CHARGES

1. The Respondent was issued license number 16882 to practice medicine and surgery in Iowa on July 1, 1964. The license is currently on probation pursuant to an Informal Settlement entered into between the Respondent and the Board on October 31, 1996.

2. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 147, 148 and 272C.

COUNT I

3. The Respondent is charged under section 148.6 (2) (i) of the 1997 Code of Iowa, with violating the provisions of an Informal Settlement between the Respondent and the Board.

CIRCUMSTANCES

4. On or about September 30, 1998, the Board received information that the Respondent had on numerous occasions prescribed controlled substances to patients in violation of the terms and conditions of an Informal Settlement entered into with the Board on October 31, 1996.

SETTLEMENT AGREEMENT

5. The Board has jurisdiction over the parties and subject matter herein.

6. Pursuant to section 148.8 of the 1997 Code of Iowa, the Respondent agrees to voluntarily surrender his Iowa medical license no later than December 11, 1998.

7. This combined Statement of Charges, Settlement Agreement and Final Order constitutes the resolution of a contested case proceeding.

8. By entering into this combined Statement of Charges, Settlement Agreement and Final Order, the Respondent voluntarily waives any rights to a contested case hearing on the allegations contained in the Statement of Charges, and waives any objections to the terms of this Settlement Agreement.

9. This combined Statement of Charges, Settlement Agreement and Final Order, is voluntarily submitted by the Respondent to the Board for consideration.

10. This combined Statement of Charges, Settlement Agreement and Final Order, is subject to approval of the Board. If the Board fails to approve this combined Statement of Charges, Settlement Agreement and Final Order, it shall be of no force or effect to either party.

11. The Board's approval of this Statement of Charges and Settlement agreement shall constitute a **FINAL ORDER** of the Board.

Robert W. Shultice M.D.
Robert Shultice, M.D., Respondent

Subscribed and sworn to before me on December 4, 1998.

Kathy C. Clayton
Notary Public, State of Iowa

This Statement of Charges and Informal Settlement is approved by the Board on

December 17, 1998.

Dale R. Holdiman MD
Dale R. Holdiman, M.D., Chairperson
Iowa Board of Medical Examiners
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